

Exhibit A

In Re: City of Detroit, Debtor

*Governor Richard D. Snyder
October 9, 2013*

*Moretti Group
471 W. South Street
Suite 41B
Kalamazoo, MI 49007
800-536-0804*



Original File 100913RS.TXT

Min-U-Script® with Word Index

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

In re: Chapter 9
CITY OF DETROIT, MICHIGAN, Case No. 13-53846
Debtor, Hon. Steven W. Rhodes

V I D E O T A P E D D E P O S I T I O N O F

WITNESS: GOVERNOR RICHARD D. SNYDER

LOCATION: The Romney Building
111 S. Capitol Avenue
Lansing, Michigan

DATE: Wednesday, October 9, 2013
8:38 a.m.

APPEARANCES:
FOR PLAINTIFFS FLOWERS:

LAW OFFICE OF WILLIAM A. WERTHEIMER
30515 Timberbrook Lane
Bingham Farms, Michigan 48025
248.644.9200
billwertheimer@gmail.com
BY: WILLIAM A. WERTHEIMER (P26275)

FOR INTERNATIONAL UNION, UAW:

COHEN, WEISS and SIMON, LLP
330 West 42nd Street
New York, New York 10036-6976
212.563.4100
pdechiara@cwsny.com
BY: PETER D. DeCHIARA, ESQUIRE

FOR THE RETIREES COMMITTEE:

DENTONS US LLP
1221 Avenue of the Americas
New York, New York 10020-1089
212.768.6881
arthur.ruegger@dentons.com
BY: ARTHUR H. RUEGGER, ESQUIRE

09:59:47 1 be.

09:59:47 2 Q. Okay. Well, Mr. Orr used the word "there must be".

09:59:50 3 A. Uh-huh.

09:59:51 4 Q. Did you share that view that there had to be?

09:59:53 5 A. Not necessarily.

09:59:55 6 Q. Okay.

09:59:55 7 A. Just as I said.

09:59:56 8 Q. Okay. So did you think about this issue as of -- or

10:00:01 9 as of the July 18th, 2013 time frame, had you given

10:00:04 10 thought to whether or not there had to be cuts to

10:00:10 11 accrued pension benefits?

10:00:12 12 A. I gave thought to the issue because I have concern

10:00:14 13 for the retirees, and that was why one of the

10:00:16 14 important questions in my view was to have a retiree

10:00:20 15 representative in the bankruptcy.

10:00:22 16 Q. And what was your -- since you said you gave thought

10:00:27 17 to it, can you articulate what your position was as

10:00:29 18 to whether or not there had to be cuts in accrued

10:00:33 19 pension liabilities? And I'm focusing on your views

10:00:36 20 on the matter as of July 18th, 2013.

10:00:40 21 A. My view going back prior to that is is I had hoped

10:00:47 22 that there would be negotiations to resolve this

10:00:50 23 short of bankruptcy because bankruptcy was a last

10:00:54 24 resort; that I hoped that people could come to the

10:00:57 25 table and come up with a mutual understanding and

10:01:00 1 negotiation that would be satisfactory to the
10:01:01 2 parties involved.

10:01:02 3 That didn't happen in terms of that regard
10:01:05 4 but I still had hope to say that as you go through
10:01:09 5 the bankruptcy process I viewed it as likelihood
10:01:11 6 that there was less flexibility under the bankruptcy
10:01:14 7 process just because of the nature of federal
10:01:17 8 bankruptcy law than there probably was before.

10:01:19 9 Q. Was it your view that as of July 18th in the
10:01:28 10 bankruptcy one way or another accrued pension
10:01:32 11 liabilities would have to be reduced?

10:01:34 12 A. Based on the facts going into it, it was one of
10:01:37 13 those questions, as you said, there was a likelihood
10:01:40 14 of that happening.

10:01:41 15 Q. That's not my question.

10:01:42 16 A. Yes. Yeah, I believe there's a likelihood there
10:01:46 17 could be reductions in unfunded pension liabilities.

10:01:50 18 Q. Okay. I'm not asking --

10:01:51 19 A. Yeah.

10:01:52 20 Q. Governor, I'm not asking you to predict the
10:01:55 21 likelihood of what might have happened.

10:01:56 22 A. Okay.

10:01:56 23 Q. I'm asking you whether you believed that in
10:02:00 24 bankruptcy there would have had to be one way or
10:02:03 25 another reductions in Detroit's accrued pension

CERTIFICATE

STATE OF MICHIGAN)
) SS:
COUNTY OF OAKLAND)

I, LAUREL A. JACOBY, Certified Shorthand reporter, a Notary Public, hereby certify that I recorded in shorthand the examination of GOVERNOR RICHARD D. SNYDER, the deponent in the foregoing deposition; and that prior to the taking of said deposition the deponent was first duly sworn, and that the foregoing is a true, correct and complete transcript of the testimony of said deponent.

I further certify that no request was made for submission of the transcript to the deponent for reading and signature and that no such submission was made.

I also certify that I am not a relative or employee of a party or an attorney for a party; or financially interested in the action.

LAUREL A. JACOBY, CSR-5059, RPR

Notary Public, Oakland County, Michigan

My commission expires: 9/1/18

Dated: This 11th day of October, 2013.